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Via ECFS

February 28, 2018

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: ***In the Matter of ETC Annual Reports and Certifications*, WC Docket No. 14-58: Connect America Fund Phase II Broadband Deployment Location Data**

Dear Ms. Dortch:

In connection with the FCC's November 18, 2011 *USF/ICC Transformation Order* in WC Docket Nos. 10-90, *et al*., CenturyLink provides this letter regarding submission and certification of Connect America Fund Phase II (CAF II) broadband deployment location data in the USAC High Cost Universal Broadband (HUBB) portal.

CenturyLink has previously submitted and certified CAF II broadband deployment location data in the HUBB for the 2015 and 2016 program years. CenturyLink also recently submitted and certified broadband location deployment data for new latitude and longitude points in 2017. To provide a more accurate report of CenturyLink's CAF II broadband deployment as of December 31, 2017, however, CenturyLink also needed to make certain modifications to the 2015/16 data that it had previously submitted. Due to current HUBB portal restrictions on data modifications, CenturyLink was unable to make those changes.

As currently configured, the HUBB portal will only accept records with new geospatial points (latitude and longitude). Any point previously loaded into the portal and certified cannot be amended; it cannot be removed and the total number of locations at the point cannot be updated (add/subtract). There is also no ability to make changes to certified data in an automated or bulk manner. These constraints are inconsistent with the simple reality that things change, particularly with the techniques used by geocoding software, and these changes were at least to some degree anticipated by the FCC and USAC as reflected in USAC's Geolocation Methods guide.[1]

[1] *See* Geolocation Methods: A Guide to Successfully Collecting Broadband Deployment Data,

In order to facilitate an orderly upload of the broadband deployment location data into the HUBB, CenturyLink's representative has certified the submission with a request that a supplemental filing also be made with the FCC and USAC to state that the company's complete broadband deployment location data as of December 31, 2017 differs from the cumulative data currently contained in the HUBB. The cumulative data in the HUBB inaccurately represents the total number of locations to which CenturyLink has deployed broadband under the program as of year-end 2017, by understating the number of locations in some states and overstating the number in others.

As a result, the data currently in the HUBB does not have accurate information on CenturyLink's deployment for meeting the first interim milestone. CenturyLink's complete data for year-end 2017 reflects that CenturyLink met the milestone in all but three states: Colorado, Kansas, and South Dakota and in each of those states was within five percent of the milestone. CenturyLink hereby certifies that it has met the first interim milestone in all of its states other than Colorado, Kansas, and South Dakota and that for each of these three states it has deployed to thirty-eight percent or more of the CAF II locations in the state.

CenturyLink understands and appreciates that the FCC and USAC are evaluating modifications to the HUBB that would enable companies to make certain changes to prior year deployment data. If the restrictions in the HUBB are modified, then CenturyLink should be able to update its location data in the HUBB to more accurately reflect its broadband enablement status under the CAF II program as of December 31, 2017. In the interim, CenturyLink is separately providing a complete record of its December 31, 2017 CAF II broadband deployment location data to USAC.

Please contact me via the above contact information if you have any questions.

Sincerely,

/s/ Jeffrey S. Lanning

cc: Alexander Minard, Wireline Competition Bureau

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http://www.usac.org/_res/documents/hc/pdf/tools/HUBBGeolocationMethods.pdf (discussing automated address geocoding as one of three methods for gathering geolocation data and noting the pros and cons of each method).